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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORLAND DIVISION

**CONSUMER CELLULAR,
INCORPORATED**, an Oregon corporation,

Case No.: 3:15-cv-01908-PK

Plaintiff,

v.

CONSUMERAFFAIRS.COM, INC., a
Nevada corporation; **CONSUMERS
UNIFIED, LLC**, a Nevada limited liability
company; and **DAVID ZACHARY
CARMAN**,

**PLAINTIFF'S UNOPPOSED
MOTION TO EXTEND
DISCOVERY DEADLINE AND
CORRESPONDING PRETRIAL
DEADLINES**

Defendants.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7-1, Plaintiff submits this unopposed motion to extend the discovery deadline and corresponding pretrial deadlines. The undersigned counsel for

Plaintiff certifies that he has conferred with Defendants' counsel, Duane Bosworth, who does not oppose and concurs with this motion, including the reasons and dates stated herein.

MOTION

Plaintiff moves for an extension of all case management deadlines, including the following:

| <u>Deadline</u> | <u>Current</u> | <u>Proposed</u> |
|---------------------|------------------|---|
| Discovery | February 8, 2016 | June 7, 2016 (120 days) |
| Dispositive Motions | February 8, 2016 | July 22, 2016 |
| Joint ADR Report | March 7, 2016 | July 22, 2016 |
| Pretrial Order | March 7, 2016 | 30 days after ruling on dispositive motions |

ARGUMENT

There have previously been no time extensions of case management deadlines in this case. A Rule 16 conference has not been held while a special motion to strike remains pending.

This motion complies with Local Rule 16-3. There is good cause for the deadlines to be modified while the special motion to strike is pending. No trial date has been set.

This motion is made in good faith, not for the purpose of delay, and is supported by the record on file herein and the attached Declaration of Robert B. Lowry.

DATED this 5th day of February, 2016.

s/Robert B. Lowry

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Attorneys for Plaintiff